

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
(WESTERN DIVISION)

C.A. No.: 11-30123-KAR

**MICHAEL ZOUFALY, Individually and on
Behalf of All Other Persons Similarly Situated,
Plaintiff,**

v.

**WORLDWIDE TECHSERVICES, LLC,
WORLDWIDE TECHNOLOGY SERVICES,
LLC, and QUALXSERV, LLC,
Defendant**

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF THE
SETTLEMENT AND AN AWARD OF ATTORNEYS' FEES AND COSTS**

Plaintiffs hereby submit this unopposed motion for final approval of the proposed Stipulation and Settlement Agreement (the "Settlement") in this Action. For the reasons set forth in the transcripts of the Preliminary Approval Hearing, Plaintiffs' motion and memorandum in support of preliminary approval of the Settlement, and the accompanying memorandum in support of final approval of the Settlement, Plaintiffs respectfully request that the Court enter and order substantially in the form of **Exhibit A** attached hereto.

Plaintiffs respectfully move this Court for an Order:

- a. Approving the Settlement as fair, reasonable, and adequate and granting Final Approval to the Settlement.
- b. Making approval final of the Settlement under the Fair Labor Standards Act on behalf of the FLSA Plaintiffs, which include "**ALL CURRENT OR FORMER TECHNICIANS EMPLOYED BY DEFENDANTS AT ANY TIME FROM**

**JUNE 3, 2009 TO JUNE 6, 2012 WHO FILED AN OPT-IN CONSENT
FORM IN THIS ACTION.”**

- c. Ordering that \$2,500 paid as additional compensation to Plaintiff, consistent with both the terms of the Settlement and the notice provided to the FLSA Plaintiffs.
- d. Awarding attorneys’ fees and costs to Plaintiffs’ Counsel in the amount of \$25,000.00.
- e. Ordering that any portion of the Settlement Fund not distributed to Settlement Beneficiaries because they could not be located and/or failed to negotiate the checks sent to them within 120 days of issuance be paid as a cy pres award to the Hampden County Bar Association.

Dated: June 2, 2015

Respectfully submitted,

/s/ Jeffrey S. Morneau
Jeffrey S. Morneau (BBO# 643668)
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Local Rule 7.1 Certification

I hereby certify that I have conferred with Kimberly Klimczuk, counsel for Defendant, who indicated that Defendant does not oppose this Motion.

/s/ Jeffrey S. Morneau
Jeffrey S. Morneau

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”) and paper copies will be sent to those indicated as non-registered participants on the date of its filing.

/s/ Jeffrey S. Morneau

Jeffrey S. Morneau